EXHIBIT B



where the events giving rise to this claim occurred.

II. Plaintiff

3. Plaintff. Shawn Thomas Moore, is and was at all fines mentioned herein a pretrial detainer of the Lawrence Country Jail, New Castle, PA.

III. Defendantis

4. Defendant, Brian Covert, is the Warden of the Laurence County fail. He is legally responsible for the operations of the Laurence County fail (ICI") and for the welfore of all inmates.

5. Defendant, Dr. Rossino, is employed



through Prinecare Medical via LCT contract. 6. Defendant, John Doe, Corporate Vice President of Risk Management, is responsible for the weekly review of all inmate grievances pursuant to page 8 paragraph 22 of contract with L. C. J. 7. Défendant, Princease Médical Inc., is a private company contracted through L. C. J. to provide medical freatment to its immates.

8. Each defendant is sued individually and in his or her official Capacity. At all times mentioned in this complaint each dependant acted under the color of state law.

IV. Facts

9. Plaintiff, Shawn Thomas Moore, has bæn a pretrial detainer since June 14th, 2012. 10. The plaintiff has Hepatitis C and is in need of proper freatment to prevent serious exocertation and further irepuble haim to his liver. 11. Hepatitis (is a serious medical condition that requires proper healment. 12. as of 5/28/13 the plaintff has been given approximately four ALT liver function desto as part of his Crohnic care conduction. Each test has shown 3 to 4 fines the

normal levels of liver function. 13. Defendant, Dr. Rossino, réfuses to have the plaintiffs serious medical condition properly frester. 14. Plaintff has submitted several "sick call" slips regarding pain in his liver and has still received he treatment as the damage to his liver becomes exacerbates. 15. Plaintiff has submitted several sich call slips regarding increased pain in his liver to no avail. 16. On approxionately 11/20/12, Plaintff filed a grievance regarding his health. 17. On 11/28/12, Plaintiff received an onswer to his grievance deriging it.
18. On 11/28/12, Plaintiff filed his appeal to the derival of his grievance.
19. Plaintiff received no response to his appeal.

20. On 11/28/12, Plaintiff filed an additional guevance to the Warden, Brian Covert, to ensure his knowledge of the situation. On 11/28/12, Captain tanno came to the block the plaintiff is housed at approximately 7:30 PM. Captain Farno said he would personally put the grievance on Worden Coverts desk.

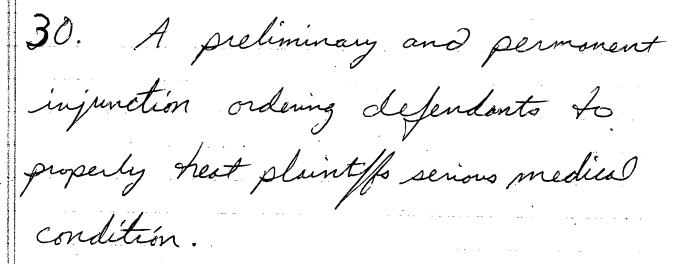
21. Plaintiff subsequently has been given both a sonogram and x-ray to rule out other causes. Both fests were negative to other potential causes. 22. Plaintiff received no response to his second guerance a appeal. 23. The Plaintiffs right to be spec from cruel and unusual punishment under the 8th Amendment as applied to him Through the 5th and 14th Amendments of Duc

Process have been violeted as a pretire detainer.

I. Exhaustion of Legal Remedies 24. Plaintff, Shawn Thomas Moore, used the inmate grievance procedure available at L.C.T., per inmote handbook pg 16, to try and resolve the publism. On 11/22/12 the plaintff presented the issues related to this complaint. On 11/28/12, plaintiff received a devial of his grierouco. On 11/28/12, plaintff appeiled the devial of his greener and got no response to his appeal. Plaintiff further filed and additional grievance and then appeal with no response.

VI. Legal Claims 25. Plaintiff realleges and incorporates by reference parographs 1-24. 26. The deliberate indifference of the defendants to the plaintiffs serious medical needs have violated the plaintiffs rights to be free from ornel and unusual punishment as applied to him though 5th and 14th Amendments of Due Process 40 the United States Constitution. 27. The plaintiff has no plain, adequate a complete remedy at law to redress the wrongs described Kerein. Plaintiff has been and continues to be

irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief plaintff seeks and any additioned equitable relief this court deems fit. VII. Proyers For Reliet 28. Wherefore, plaintiff respectfully prays that this honorable court enter judgement granting plaintss: 29. A declaration that the acts and omissions described herein violated plaintiffs rights under the Constitutions and laws of the United States and Pennsylvania.



31. Nomine Damages against each defendant.
32. Compensatory Damages against each defendant.
33. Puritive Damages against each defendant.
34. A jury friel on all issues triell by jury.
35. Plaintffs costs in this suit.
36. Any additional relief this
court deems just, proper, and equitable.

Respectfully Subnitted

Shawn Thomas Moore

Maun Thomas Moor 111 S. Milton St. New Castle, PA 16101 (13)

VERIFICATION I have read the foregoing complaint and hereby verify that the matters alleged therein are fine, except as to nothers alleged on information and belief, and, as to those, I believe them to be five. I certify under penalty of perjuny that the foregoing is free and correct. Executed at New Castle, PA on 6/2/14 Skan Mooro Shawn Thomas Moore III S. Milton St. New Castle, PA 16101